

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
CLERK OF COURT
23 APR 25 P 3 00
JUDGE CASE

ABRAHAM PHILIP, M.D.
Plaintiff,

v.

JOHN CRONIN,
Defendant.

**MEMORANDUM OF REASONS IN SUPPORT OF MOTION OF DEFENDANT JOHN
CRONIN TO EXTEND DISCOVERY PERIOD (UNOPPOSED)**

Now comes the Defendant John Cronin and moves that this court extend the Discovery Period in this matter such that all discovery should be completed on or before July 29, 2005.

In support of this motion, Defendant states as follows:

The Summons and Complaint in this matter were served upon the Defendant on June 16, 2004. After the exchange of preliminary disclosures, this Court ordered on 11/2/04 that discovery should be completed on or before 3/31/05. On 3/3/05 Plaintiff filed a Motion for Extension of Time to 5/31/05 to Complete Discovery, to which Motion Defendant gave his assent. On 3/10/05 the Court entered an Order granting Plaintiff's Motion.

Defendant's counsel Mary O'Neil has now taken a medical leave until the end of June, 2005, and effective 4/20/05, the undersigned has taken over the handling of this matter, as well as a related case pending in state court. Defendant submits that new counsel will require the additional requested time to familiarize herself with this matter and to complete discovery in accordance with the previously filed discovery disclosures.

Defendant notes that there is no opposition to this motion.

WHEREFORE Defendant respectfully requests that this court extend the Discovery Period in this matter such that all discovery should be completed on or before July 29, 2005.

Respectfully Submitted,
COMMONWEALTH OF MASSACHUSETTS

By its Attorneys,

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